

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA**

BABY DOE, <i>et al.</i> ,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	Case No. 3:22-cv-00049-NKM
)	
JOSHUA MAST, <i>et al.</i>)	
)	
<i>Defendants,</i>)	
)	
And)	
)	
UNITED STATES SECRETARY OF)	
STATE ANTONY BLINKEN, <i>et al.</i> ,)	
)	
<i>Nominal Defendants.</i>)	
_____)	

**DEFENDANT RICHARD MAST’S SUPPLEMENTAL REILING OF EXHIBIT
18 TO MEMORANDUM IN OPPOSITION TO PLAINTIFF’S MOTION FOR
PROTECTIVE ORDER**

Defendant Richard Mast filed his opposition to Plaintiffs’ motion for entry of a protective order filed yesterday, February 27, 2023 (Dkt. No. 171). As part of that filing, Exhibit 18 (Dkt. No. 171-18), while itself redacted, inadvertently included John Doe’s last name in two locations on an email. When Plaintiffs’ counsel brought this to Defendant Richard Mast’s counsel’s attention, the undersigned immediately contacted the Court’s clerk, Dylan Gaddes, who placed that Exhibit 18 under seal. Mr. Gaddes instructed counsel to file a notice to seal that document and to file a new Exhibit 18 with the additional two redactions. This filing represents the corresponding follow-up; a notice to seal will also be forthcoming.

February 28, 2023

Respectfully submitted,

/s/David Yerushalmi

David Yerushalmi, Esq.*

American Freedom Law Center

2020 Pennsylvania Avenue NW, Suite 189

Washington, D.C. 20006

(*Admitted *pro hac vice*)

E. Scott Lloyd

Lloyd Law Group, PLLC

Va. Bar # 76989

20 E. 8th Street, Suite 3

Front Royal, VA 22630

Office: (540) 823-1110

Cell: (540) 631-4081

Fax: (540) 583-4279

scott@lloydlg.com

Counsel for Defendant Richard Mast

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. I further certify that a copy of the foregoing has been served by ordinary U.S. mail upon all parties for whom counsel has not yet entered an appearance electronically: none.

/s/ David Yerushalmi
David Yerushalmi, Esq